

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION

Amawi, et al.	§
<i>Plaintiffs,</i>	§
	§
v.	§ Civil Action No.: 1:18-CV-1091-RP
	§
Pflugerville I.S.D., et al.	§
<i>Defendants.</i>	§

**PLUECKER PLAINTIFFS' OPPOSED MOTION FOR ATTORNEYS' FEES**  
**PURUSANT TO 42 U.S.C. § 1988**

*Pluecker* Plaintiffs file this opposed motion for attorneys' fees and costs against Defendant, the Attorney General. In support of this motion, *Pluecker* Plaintiffs respectfully show as follows:

*Pluecker* Plaintiffs sought to enjoin Defendants, including the Attorney General, from requiring them to certify that they have not and will not participate in boycotts of Israel for the life of the contract, pursuant to H.B. 89 ("the Act"). After finding that *Pluecker* Plaintiffs were likely to succeed on the merits, this Court enjoined the Act. In response, the Legislature amended the Act so that it no longer applies to sole proprietors like Plaintiffs. Accordingly, *Pluecker* Plaintiffs are prevailing parties in this litigation and entitled to reasonable fees and costs.

Pursuant to this Court's May 28, 2020 Order in the above-captioned case, and pursuant to 42 U.S.C. § 1988, Fed. R. Civ. P. 54(d), and Western District of Texas Local Rule CV 7(j), *Pluecker* Plaintiffs respectfully move this Court for an award of attorneys' fees.

Pursuant to this Court's local rule CV- 7(i), counsel for *Pluecker* Plaintiffs conferred in a good-faith attempt with counsel for the State to resolve the matter by agreement, but no agreement could be reached.

Based on this motion, the attached supporting brief and accompanying materials, as well as the record in this case, *Pluecker* Plaintiffs seek a total sum of \$224,266.50 in fees, and \$1220.10 in costs. The Court also has discretion to increase the fees award by a multiplier.

For the reasons stated above, *Pluecker* Plaintiffs respectfully request that this Court grant this Motion for Attorneys' Fees Pursuant to 42 U.S.C. § 1988 and award *Pluecker* Plaintiffs the requested amount.

Respectfully submitted,

/s/ Edgar Saldivar

Edgar Saldivar, TX Bar No. 24038188  
Thomas Buser-Clancy, TX Bar No. 24078344  
Andre Segura, TX Bar No. 24107112\*\*  
ACLU Foundation of Texas, Inc.  
P.O. Box 8306  
Houston, TX 77288  
Telephone: (713) 325-7011  
Fax: (713) 942-8966  
esaldivar@aclutx.org  
tbuser-clancy@aclutx.org  
asegura@aclutx.org

Brian Hauss\*\*  
Vera Eidelman\*\*  
American Civil Liberties Union Foundation  
Speech, Privacy & Technology Project  
125 Broad Street, 18th Floor  
New York, NY 10004  
Telephone: (212) 549-2500  
Fax: (212) 549-2654  
bhauss@aclu.org  
veidelman@aclu.org

Kevin Dubose\*\*  
Alexander, Dubose, Jefferson & Townsend  
1844 Harvard Street  
Houston, TX 77008  
Telephone: (713) 522-2358  
Fax: (713) 522-4553  
kdubose@adjtlaw.com

\*\* Admitted *pro hac vice*

**CERTIFICATE OF CONFERENCE**

I certify that on June 17, 2020, I conferred with counsel for the Paxton Defendants regarding the relief requested in this motion and counsel for Paxton Defendants indicated their opposition.

/s/ Edgar Saldivar  
Edgar Saldivar

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing document was served upon counsel of record through the Court's electronic filing system on July 6, 2020.

/s/ Edgar Saldivar  
Edgar Saldivar